

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:
	:
C.F. THOMAS, III,	: BANKRUPTCY NO. 20-12589-elf
Debtor	:
	: CHAPTER 13
PENNSYLVANIA HOUSING FINANCE	:
AGENCY	: HEARING: SEPTEMBER 27, 2022
	: 9:30 A.M.
Movant	:
vs.	:
	:
C.F. THOMAS, III and	:
KENNETH E. WEST, Trustee	:
Respondents	:

MOTION TO OBTAIN RELIEF FROM STAY

TO THE HONORABLE ERIC L. FRANK, U. S. BANKRUPTCY JUDGE:

AND NOW comes Pennsylvania Housing Finance Agency by its attorneys, Purcell, Krug & Haller, and files this Motion to obtain relief from the automatic stay pursuant to Section 362(d) of the Bankruptcy Code as follows:

1. That this is a contested matter under Rule 9014 brought pursuant to 11 USC Section 362(d).
2. Movant, Pennsylvania Housing Finance Agency (hereinafter "PHFA"), is a company with an office located at 211 North Front Street, Harrisburg, Pennsylvania 17101.
3. Respondent, C.F. Thomas, III, is an adult individual whose last known address is 1134 Allengrove Street, Philadelphia, Pennsylvania 19124.
4. Respondent, Kenneth E. West, Esquire, is the Trustee duly appointed in the above case with a place of business at 1234 Market Street, Suite 1813, Philadelphia, Pennsylvania 19107.
5. Movant, PHFA, holds the first mortgage against Debtor's property located at 1134 Allengrove Street, Philadelphia, Pennsylvania 19124.

6. The balance owed Movant is approximately \$132,800.00.
7. Other liens against the property: None.
8. The value of the real estate is approximately \$186,210.00 (per Debtor's Schedules).
9. Debtor has failed to make six (6) post-petition payments to Movant (at \$1,230.24 each).
10. Movant is entitled to relief for cause.

WHEREFORE, Movant prays for the entry of an Order terminating the automatic stay and granting Movant leave to proceed with its State Court remedies and that such further relief be granted as your Honorable Court deems fair and equitable.

PURCELL, KRUG & HALLER

By: /s/Leon P. Haller

Leon P. Haller

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Dated: September 1, 2022